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[Proposed] Counsel to the Official Committee
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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

THE ROMAN CATHOLIC ARCHBISHOP OF
SAN FRANCISCO,

Debtor and Debtor in Possession.

Case No.: 23-30564

Chapter 11

**RESPONSE OF THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS TO DEBTOR'S
EMERGENCY MOTION FOR ORDER (1)
AUTHORIZING PAYMENT OF
PREPETITION WAGES, SALARIES AND
EMPLOYEE EXPENSES; (2) TO PAY
ACCRUED EMPLOYEE BENEFITS AND
TAXES; AND (3) DIRECTING BANKS TO
HONOR PAYROLL AND EXPENSE
CHECKS [ECF No. 7]**

Hearing:

Date: October 26, 2023

Time: 1:30 p.m.

Place: Via ZoomGov

The Official Committee of Unsecured Creditors (the "Committee"), by its proposed counsel, hereby files this response (the "Response") to *Debtor's Emergency Motion for Order (1) Authorizing Payment of Prepetition Wages, Salaries and Employee Expenses; (2) to Pay Accrued Employee Benefits and Taxes; and (3) Directing Banks to Honor Payroll and Expense Checks* [ECF No. 7] (the "Wage Motion"), filed by The Roman Catholic Archbishop of San Francisco (the "Debtor") on

August 21, 2023. The Committee's Response addresses only the portion of the Wage Motion relating to Debtor's payment of prepetition wages, salaries, and employee expenses (the "Wages").

**The Debtor Should Disclose Information –
Including Names - Regarding Sexual Abuse Perpetrators**

On August 25, 2023, the Court entered a generally routine order authorizing the Debtor to pay prepetition Wages. *See Interim Order Granting Debtor's Emergency Motion for Order (1) Authorizing Payment of Prepetition Wages, Salaries, and Employee Expenses; (2) to Pay Accrued Employee Benefits and Taxes; and (3) Directing Banks to Honor Payroll and Expense Checks* [ECF No. 42] (the "Wage Order"). While the Wage Order seeks to pay a *de minimis* amount of Wages, approximately \$3,700, the Wage Order notably provides the following:

Nothing in this Interim Order authorizes the Debtor to make any payments that benefit, directly or indirectly, **any credibly accused perpetrator of abuse**, whether for wages, support, housing, prepetition claims, retirement or otherwise.

Wage Order, ¶8 (emphasis added).

In light of the above paragraph that the Debtor's voluntarily used in the Wage Order, the Committee requested a list of the Debtor's "credibly accused"¹ perpetrators so that it could verify that the Debtor was not paying prepetition Wages of such individuals. In response, the Debtor informed the Committee that it has no such list of "credibly accused" and that the few individuals benefiting from the Wage Order are each on the Debtor's "good standing" list. In the end, the Debtor refused to provide any information about the many people who are subject to any type of abuse allegations.

The chapter 11 cases premised on decades of childhood sexual abuse claims, like this case here, are not just about the payment of abuse Survivors' claims. They are also about accountability, ownership of the past, the disclosure of information under the control of the Debtor that support Survivors' abuse claims, and insuring that the abuse suffered by more than 500 Survivors does not happen to any other children or adults after the Debtor emerges from bankruptcy.

The Court summarized the Committee's concern at the first-day hearing in this case: "If the

¹ The term "credibly accused" as it relates to perpetrators of sexual abuse is not defined by law. The Committee must know how Debtor uses that term in order to assess the adequacy of its future disclosures of abuser names.

debtor has a known abuser, whether it's a credible accusation or a[n] incredible one, I wonder why that person is on the payroll." *See* Tr. of August 24, 2023 hearing (attached hereto as **Composite Exhibit A**), at 25: 6-9.

At the initial Section 341 Meeting of Creditors on September 28, 2023, the Debtor's representative surprisingly stated that there are two active clergy members and two inactive clergy members in the Archdiocese of San Francisco who are subject to abuse allegations. *See* Tr. of September 28, 2023 meeting (attached hereto as **Composite Exhibit B**), at 22:16-32. The Debtor has represented to the Committee that the foregoing individuals are not benefiting from the proposed Wage Order.

The Debtor has failed to make public, or even to produce to the Committee, a list of all abusers - whether accusations against them are proven, credible, incredible, or otherwise. However, at least 192 Catholic arch/dioceses and religious order provinces in the United States have publicly disclosed the names (and other information) of people within their jurisdictions who have committed sexual abuse.² California is home to 12 Catholic arch/dioceses.³ All of the arch/dioceses in California – except for Debtor – have filed lists of abusers.⁴

The Committee does not object to the Motion but rather takes this opportunity to preview an issue that the Motion raises: the identification of the perpetrators giving rise to the more than 500 childhood sexual abuse claims. At the first day hearing, the Court noted, and the Debtor has made clear, that sexual abuse and claims arising from that sexual abuse, prompted filing of this bankruptcy case. *See e.g., See Composite Exhibit A*, at 66: 5-7 and 66:14-15.

The transparency required in this bankruptcy case starts with an honest accounting of who is an abuser. Not only does that assist in evaluating proofs of claim in the future, but also it lifts the veil of secrecy that the Committee's constituency – sexual abuse Survivors – have been held under for

[remainder of page left intentionally blank]

² *See* https://www.bishop-accountability.org/AtAGlance/diocesan_and_order_lists.htm (viewed on October 12, 2023).

³ *See* <https://cacatholic.org/about/> (viewed on October 12, 2023).

⁴ *See* n.1, above.

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2 too many years. The Committee must be informed about who Debtor knows to be a “credibly
3 accused” perpetrator of sexual abuse and how Debtor defines “credibly accused.” Such “credibly
4 accused” perpetrators conceivably are not publicly named in lawsuits but are known to the Debtor.
5 Moreover, as we learned at the initial 341(a) hearing, abusers may still be in ministry within the
6 Archdiocese of San Francisco or otherwise have access to children. Should the Debtor fail to
7 voluntarily provide the information that 192 other Catholic entities throughout the country have
8 provided in this regard, the Committee will seek it through discovery.

9 Dated: October 13, 2023

PACHULSKI STANG ZIEHL & JONES LLP

10 By: /s/ John W. Lucas

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20 [Proposed] Counsel to the Official Committee of
21 Unsecured Creditors
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COMPOSITE EXHIBIT A

(Selected Pages of the Transcript of the August 24, 2023 Hearing)

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

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In Re:) Case No. 23-30564
) Chapter 11
THE ROMAN CATHOLIC ARCHBISHOP)
OF SAN FRANCISCO) San Francisco, California
) Thursday, August 24, 2023
Debtor.) 1:30 PM
)

DEBTOR'S EMERGENCY MOTION FOR
INTERIM AND FINAL ORDERS (1)
PROHIBITING UTILITY COMPANIES
FROM ALTERING, REFUSING OR
DISCONTINUING SERVICE, (2)
DETERMINING ADEQUATE
ASSURANCE OF PAYMENT FOR
POST-PETITION UTILITY
SERVICES UNDER 11 U.S.C. §
366, (3) ESTABLISHING
PROCEDURES FOR DETERMINING
ADEQUATE ASSURANCE OF
PAYMENT, AND (4) SCHEDULING A
FINAL HEARING FILED BY THE
ROMAN CATHOLIC ARCHBISHOP OF
SAN FRANCISCO [8]

DEBTOR'S EMERGENCY
APPLICATION FOR ENTRY OF AN
ORDER (I) AUTHORIZING AND
APPROVING THE APPOINTMENT OF
OMNI AGENT SOLUTIONS, INC. AS
CLAIMS AND NOTICING AGENT,
AND (II) GRANTING RELATED
RELIEF FILED BY THE ROMAN
CATHOLIC ARCHBISHOP OF SAN
FRANCISCO [11]

DEBTOR'S EMERGENCY MOTION TO
(1) ESTABLISH NOTICE
PROCEDURES, (2) FILE
CONFIDENTIAL INFORMATION
UNDER SEAL, AND (3)
TEMPORARILY SUSPEND DEADLINE
FOR FILING PROOFS OF CLAIMS
FILED BY THE ROMAN CATHOLIC

1 ARCHBISHOP OF SAN FRANCISCO
2 [10]

3 DEBTOR'S EMERGENCY MOTION FOR
4 ORDER (1) AUTHORIZING PAYMENT
5 OF PREPETITION WAGES,
6 SALARIES, AND EMPLOYEE
7 EXPENSES; (2) TO PAY ACCRUED
8 EMPLOYEE BENEFITS AND TAXES;
9 AND (3) DIRECTING BANKS TO
10 HONOR PAYROLL AND EXPENSE
11 CHECKS FILED BY THE ROMAN
12 CATHOLIC ARCHBISHOP OF SAN
13 FRANCISCO [7]

14 DEBTOR'S EMERGENCY MOTION FOR
15 INTERIM AND FINAL ORDERS (1)
16 AUTHORIZING CONTINUED USE OF
17 EXISTING CASH MANAGEMENT
18 SYSTEM, OPERATIONAL BANK
19 ACCOUNTS AND RELATED
20 INVESTMENT ACCOUNTS; (2)
21 AUTHORIZING MAINTENANCE OF
22 EXISTING BUSINESS FORMS, (3)
23 EXCUSING COMPLIANCE WITH
24 SECTION 345(B); (4)
25 AUTHORIZING CONTINUED USE OF
CURRENT INVESTMENT POLICY;
AND (5) SCHEDULING A FINAL
HEARING FILED BY THE ROMAN
CATHOLIC ARCHBISHOP OF SAN
FRANCISCO [9]

DEBTOR'S EMERGENCY MOTION TO
CONTINUE INSURANCE PROGRAMS
FILED BY THE ROMAN CATHOLIC
ARCHBISHOP OF SAN FRANCISCO
[12]

DEBTOR'S EMERGENCY MOTION FOR
INTERIM AND FINAL ORDERS
AUTHORIZING THE DEBTOR TO (1)
PAY CERTAIN PREPETITION
INVOICES FOR ABUSE SURVIVORS'
ASSISTANCE AND SAFE
ENVIRONMENT PROGRAMS, AND (2)
CONTINUE ITS PREPETITION
PRACTICE OF PAYING FOR ABUSE
SURVIVORS ASSISTANCE AND SAFE

ENVIRONMENT PROGRAMS FILED BY
THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO [13]

HEARING REGARDING CASE
MANAGEMENT

TRANSCRIPT OF PROCEEDINGS
BEFORE THE HONORABLE DENNIS MONTALI
UNITED STATES BANKRUPTCY JUDGE

APPEARANCES (All present by video or telephone):

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(916)329-7400

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For the Debtor: PAUL E. GASPARI, ESQ.
Weintraub Tobin Chediak Coleman &
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475 Sansome Street
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San Francisco, CA 94111
(415)772-9618

For Office of the U.S.
Trustee: JASON BLUMBERG, ESQ.
United States Department of
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(916)930-2076

Also Present: Paul H. Deutch
Executive Vice President, Omni
Agent Solutions, Inc.

Joseph J. Passarello
Chief Financial Officer

1 Paula Carney
2 Debtor's Representative

3 Wayne Weitz
4 Debtor's financial advisor
5 professional

6 Paul H. Deutch
7 Executive Vice President, Omni
8 Agent Solutions, Inc.

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18 Court Recorder: LORENA PARADA
19 United States Bankruptcy Court
20 450 Golden Gate Avenue
San Francisco, CA 94102

21 Transcriber: RIVER WOLFE
22 eScribers, LLC
23 7227 N. 16th Street
Suite #207
Phoenix, AZ 85020
24 (800) 257-0885

25 Proceedings recorded by electronic sound recording;
transcript provided by transcription service.

The Roman Catholic Archbishop Of San Francisco

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1 SAN FRANCISCO, CALIFORNIA, THURSDAY, AUGUST 24, 2023, 1:31 PM

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3 (Call to order of the Court.)

4 THE CLERK: Court is now in session, the Honorable
5 Dennis Montali presiding. Calling the matter of the Roman
6 Catholic Archbishop of San Francisco, case 23-30564.

7 THE COURT: All right. Good afternoon, everyone.
8 Welcome to the San Francisco Bankruptcy Court remote edition.
9 And let me get the appearances of principal counsel. And for
10 counsel, at the moment, let's defer for the time being the
11 introduction of the representatives of the debtor. But let me
12 just get the counsels' appearances.

13 MR. PASCUZZI: Thank you, Your Honor. Paul Pascuzzi,
14 Felderstein Fitzgerald Willoughby Pascuzzi & Rios, for the
15 debtor, the Roman Catholic Archbishop of San Francisco, a
16 corporation sole. We do have cocounsel on the line as well.

17 THE COURT: And is that Mr. Katz? Is he going to make
18 an appearance? Yes.

19 MR. KATZ: Yes, Your Honor. Good afternoon. Ori
20 Katz, Sheppard, Mullin, Richter & Hampton, appearing as
21 proposed cocounsel to the debtor.

22 THE COURT: Good afternoon, Mr. Katz.

23 Mr. Blumberg.

24 MR. BLUMBERG: Good afternoon, Your Honor. Jason
25 Blumberg for the United States Trustee.

1 made pursuant to this order. And paragraph 9, Your Honor, is
2 the paragraph that dealt with not making payments to credibly
3 accuse perpetrators of abuse. So that provision was inserted
4 to resolve the concern that had been raised in the objection.

5 THE COURT: Well, in all my experience, and I've never
6 had a objection like that before, it dawned on me that if the
7 debtor has a known abuser, whether it's a credible accusation
8 or a incredible one, I wonder why that person is on the
9 payroll. But secondly, it dawned on me that even if you are an
10 abuser, which I don't condone, you're still entitled to be
11 paid. So I don't know how we can ignore the right of a person
12 to be paid if that person is paid, even though he or she may be
13 under criticism for something unrelated to the paycheck.

14 So I believe, if I'm not mistaken, in the Oakland
15 case, there was no limitation. In the Santa Rosa one, there
16 was something similar. But I guess the way you're suggesting
17 it, Mr. Katz, is that it's functionally out with a reservation
18 in case one gets through, right; is that a fair way to say it?

19 MR. KATZ: Yes, Your Honor. I mean, functionally, we
20 won't be making these payments on account of pre-petition
21 claims, even if they would otherwise be entitled to priority,
22 pending some further order of the Court. And to the extent
23 anybody wants to step forward to challenge that mechanism or a
24 payment that's been made, they're free to do so.

25 To borrow from Mr. -- I don't know if it was from Mr.

1 to any sort of decision on that issue, Your Honor.

2 THE COURT: Okay. Actually, Mr. Blumberg, your
3 comment reminds me of something I meant to ask Mr. Pascuzzi.

4 Tell me if I'm wrong. I would assume that your focus
5 is obviously on the survivors and the abuse claims -- that's
6 what's driven the Archbishop to put the debtor into
7 bankruptcy -- and that other creditors are almost incidental,
8 not incidental in a sense that they aren't significant amount
9 of money, but more likely than not they'll be unimpaired and
10 treated under a plan like more ordinary course and that all the
11 action is going to be with the survivors and their counsel and
12 the kinds of things that you and I both know is what is endemic
13 for these cases. And is that a fair assumption?

14 MR. PASCUZZI: That's a fair assumption, Your Honor.
15 Yes.

16 THE COURT: Yeah. I mean, see, that's relevant also
17 to things like claims bar date because chances are there may
18 not even be any claims filed because if your schedules are
19 complete and somebody that's owed money for some service that
20 was rendered and scheduled correctly, that person doesn't even
21 have to file a claim.

22 So I'm not changing my view on whether when the claims
23 bar date is. I understand we're having two claims bar dates
24 for this case because despite the U.S. Trustee definitions or
25 the Administrative Office of U.S. Courts' definition of mega

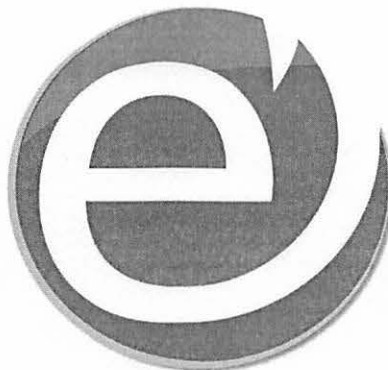
COMPOSITE EXHIBIT B

(Selected Pages of the Transcript of initial September 28, 2023 Meeting of Creditors)

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CERTIFIED TRANSCRIPT

**ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO
MEETING OF CREDITORS
SEPTEMBER 28, 2023**



Court Reporting • Video

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www.elitigationervices.com

CEDRIC: --listen-only mode during today's Q&A session. If you'd like to ask a questions, please press star, then one. And I'd like to turn today's (inaudible) to your host, Mr. Jason Blumberg. Thank you, you may begin.

BLUMBERG: Good morning. This is the first meeting of creditors for the Roman Catholic Archbishop of San Francisco. That's case number 23-30564. This case was filed on August 21, 2023. Today's date is September 28, 2023. It's approximately 10:14 a.m. My name is Jason Blumberg. I'm a Trial Attorney with the Office of the United States Trustee.

This meeting is required under Section 341(A) of the Bankruptcy Code. The purpose of the meeting is to allow for an examination of the debtor under oath. Questions may include but are not limited to why the case was filed, the operation of the business, and the prospects for the organization. I will initially question the debtor the some degree. Creditors will also have an opportunity to examine the debtor.

As a reminder, the meeting is being digitally recorded. Please remember that the recorder cannot see who you are or your head nodding so please identify yourself when asking a question and please remember to give verbal responses, which can be picked up by the recorder. The recorder works best when only one person is speaking at a time so please allow for questions to be completed before answering and please wait for answers to be completed before asking follow-up questions. Whenever you are not speaking, please mute your line to prevent background noise. We keep the recording for two years after case closure. If anyone would like to obtain a duplicate of today's proceeding or a transcript, the arrangements are made to the Office of the United States Trustee.

Before we proceed with the 341 meeting, I'm going to take a few minutes to explain what this meeting is and how it will proceed. As I mentioned, this meeting is being conducted under Section 341 of the United States Bankruptcy Code in conjunction with the bankruptcy case currently pending before the United States Bankruptcy Court in the Northern District of California. As such, it is expected that every participant will conduct themselves in a manner appropriate for a legal proceeding.

Preliminarily, the statutory purpose of the meeting is to allow creditors the opportunity to ask questions of the debtor under oath. If you don't have any questions for the debtor's representatives, you may stay on the line and listen, but you also may drop off the call at any time.

The representatives of the debtor are Archbishop Cordileone, Father Patrick Summerhays, and Joseph Passarello. By court order, Father Summerhays has been designated as the debtor's responsible individual in this case. Mr. Passarello is the debtor's senior financial director. He signed the debtor's schedules and statements.

BLUMBERG: Okay. Thank you. Now, Father Summerhays, we've kinda--we've kinda covered this next question, and the question I would typically ask here is, why did the debtor file for Chapter 11? I'll ask that question to you if you--if you want to give a short kind of response, but I think we've covered it. But if you wouldn't mind just in a sentence or two repeating the reasons, it would be appreciated.

SUMMERHAYS: Well, I think with--when all the cases came in, we had to assess how we could get to some type of a glo--global mediation to make it manageable. And we tried some mediations and we weren't making any progress and so financially it looked like the best situation for resolving these cases equitably amongst those creditors, making sure that, you know, the first ones to the trial did not end at, you know, exhausting our resources and--and being able to pay out equitably to all our--our plaintiffs, and then, also, allow us to maintain our operations here at the archdiocese, which is our responsibility, too. So it w--it--it came to be able to do those two things and it's in my--it--it was unavoidable because of just the sheer number of cases we were trying to (inaudible).

BLUMBERG: To your knowledge, have any active clergy under the jurisdiction of the archbishop been accused of abuse?

SUMMERHAYS: Yes, there--there are--there are active priests who've been accused.

BLUMBERG: Would you tell me, please, the number? How many?

SUMMERHAYS: I mean, are they--are--can you--are they just priests that are in active ministry?

BLUMBERG: Let's start there, yes, sir.

SUMMERHAYS: I think it's two.

BLUMBERG: And then what is the difference between active ministry and inactive ministry?

SUMMERHAYS: It--well, you could have someone who's retired who is, you know, in good standing and can, you know, have active--he can--he can actually be publically (inaudible).

BLUMBERG: Okay. I mean, are there any retired priests that have been accused?

SUMMERHAYS: Yes.

BLUMBERG: Okay. So can you tell how many?

SUMMERHAYS: I believe there's two.

James I. Stang (CA Bar No. 94435)
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[Proposed] Counsel to the Official Committee of Unsecured
Creditors

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

THE ROMAN CATHOLIC ARCHBISHOP OF
SAN FRANCISCO,

Debtor and Debtor in Possession.

Case No.: 23-30564

Chapter 11

CERTIFICATE OF SERVICE

STATE OF CALIFORNIA)
)
CITY OF LOS ANGELES)

I, Mary de Leon, am employed in the city and county of Los Angeles, State of California. I
am over the age of 18 and not a party to the within action. My business address is 10100 Santa
Monica Blvd., Suite 1300, Los Angeles, California 90067.

On October 13, 2023, I caused to be served the

**RESPONSE OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO
DEBTOR'S EMERGENCY MOTION FOR ORDER (1) AUTHORIZING PAYMENT OF
PREPETITION WAGES, SALARIES AND EMPLOYEE EXPENSES; (2) TO PAY
ACCRUED EMPLOYEE BENEFITS AND TAXES; AND (3) DIRECTING BANKS TO
HONOR PAYROLL AND EXPENSE CHECKS [ECF No. 7]**

in the manner stated below:

<input checked="" type="checkbox"/>	TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document was served by the court via NEF and hyperlink to the document. On October 13, 2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below
<input checked="" type="checkbox"/>	(BY MAIL on Exhibit B attached) I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Francisco, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
<input checked="" type="checkbox"/>	(BY EMAIL on Exhibit A attached) I caused to be served the above-described document by email to the parties indicated on the attached service list at the indicated email address.

I declare under penalty of perjury, under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed on October 13, 2023 at Los Angeles, California.

/s/ Mary de Leon

Mary de Leon

Mailing Information for Case 23-30564

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EXHIBIT A
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EXHIBIT B
U.S. MAIL SERVICE

California Department of Tax And Fee Admin	P.O. Box 942879 Sacramento, CA 94279
California Office of the Attorney General	1300 I St, Ste 1142 Sacramento, CA 95814
Colorado Department of Revenue	1881 Pierce St Lakewood, CO 80214
Employment Development Department	P.O. Box 989061 West Sacramento, CA 95798
Florida Department of Revenue	5050 W Tennessee St Tallahassee, FL 32399
Georgia Department of Revenue Processing Center	P.O. Box 740397 Atlanta, GA 30374
Internal Revenue Service	Attn: Centralized Insolvency Operation P.O. Box 7346 Philadelphia, PA 19101-7346
New Mexico Taxation and Revenue Department	P.O. Box 25127 Santa Fe, NM 87504
San Francisco County Clerk	1 Dr Carlton B Goollett Pl City Hall, Room 168 San Francisco, CA 94102
San Francisco Tax Collector	c/o Secured Property Tax P.O. Box 7426 San Francisco, CA 94120
San Mateo County Tax Collector	555 County Center, 1st Floor Redwood City, CA 94063
State of California Franchise Tax Board	P.O. Box 942867 Sacramento, CA 94267
The Roman Catholic Archbishop of San Francisco	One Peter Yorke Way San Francisco, CA 94109
Virginia Department of Taxation	P.O. Box 1115 Richmond, VA 23218
Virginia Employment Commission	P.O. Box 26441 Richmond, VA 23261